

JENNIFER MOUZIS
MOUZIS CRIMINAL DEFENSE

State Bar No. 200280
1819 K Street, Suite 200
Sacramento, California 95811
Telephone: (916) 822-8702
Facsimile: (916) 822-8712

Attorney for Defendant
JUAN VALENTIN MANRIQUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN MANRIQUEZ,

Defendant.

2:21-cr-00213-DAD-1

**STIPULATION AND
ORDER TO CONTINUE STATUS
CONFERENCE, AND TO EXCLUDE
TIME - AMENDED**

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Justin Lee and Defendant Juan Manriquez, by and through his counsel, Jennifer Mouzis agree and stipulate to vacate the date set for status conference, **October 4, 2022 at 9:00 a.m., in the above-captioned matter, and to continue the status conference to December 6, 2022 at 9:30 a.m. in the courtroom of the Honorable Dale A. Drozd.**

By previous order, this case was set for status conference on October 4, 2022 (ECF 28). On September 29, the defense was notified by a party of information that we believe may impact upon the defense of our case. We need a licensed investigator to interview witnesses to determine the significance of the information. Me. Manriquez's investigator, Mr. Paul Schindler,

1 is unable to perform the needed investigation as Mr. Schindler is out of state until October 17,
2 2022 whereupon he can commence the investigation. Defense counsel requests a continuance in
3 order to further prepare, confer with her client, review the discovery, and otherwise prepare for
4 trial or resolution of this case. The Government does not object to this continuance.
5

6 Based upon the foregoing, the parties stipulate that that the ends of justice served by
7 granting the continuance outweighs the best interest of the public and the defendants in a speedy
8 trial. The parties also agree and stipulate that time under the Speedy Trial Act should be
9 excluded as of October 4, 2022, through and including December 6, 2022; pursuant to 18 U.S.
10 §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479 [Local Code
11 T4].

12 Accordingly, the parties respectfully request the Court adopt this proposed stipulation.
13 IT IS SO STIPULATED.

14 Dated: October 3, 2022

PHILLIP A. TALBERT
United States Attorney

15
16 By: /s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney

17
18 Dated: October 3, 2022

/s/ Jennifer Mouzis
JENNIFER MOUZIS
Attorney for Defendant
JUAN VALENTIN MANRIQUEZ

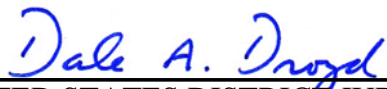
ORDER

IT IS HEREBY ORDERED, the Court having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.¹ The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, considering the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interest of the public and defendants in a speedy trial.

The Court orders from the time of the parties' stipulation, September 30, 2022, up to and including December 6, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479 [Local Code T4]. **It is further ordered** the October 4, 2022 status conference as to defendant Manriquez shall be continued until December 6, 2022, at 9:30 a.m.

IT IS SO ORDERED.

Dated: October 3, 2022


UNITED STATES DISTRICT JUDGE

¹ It remains somewhat unclear to the court why this matter could not be set for trial confirmation and jury trial at a status conference to be held on October 4, 2022, by the setting of future dates that takes into account defense counsel's need to conduct further investigation as to recently received information. Nonetheless, the court will adopt the parties' stipulation. However, counsel is forewarned that the December 6, 2022 status conference set by this order will not be continued absent a compelling showing of good cause.